## Benjamin W. Hill, Esq.

Partner

July 15, 2020

Via email only Confidential and Filed Under Seal

Hon. Christian Hummel James T. Foley Courthouse 445 Broadway Albany, NY 12207

Re: Special Master Request for Payment of Fees (1:18-cv-566)

Dear Your Honor:

Enclosed for your review is an invoice for services rendered through July 15, 2020 in the above-referenced matter which is being submitted to you under seal per the Court's instruction.

If you have any questions or concerns, please do not hesitate to contact me.

Respectfully submitted,

CAPEZZA HILL, LLP

By:

Beniamin W. Hill

Encs.

Capezza Hill, LLP 30 South Pearl Street P-110 Albany, NY 12207 United States 518-478-6065



Hon. Christian Hummel

Balance \$50,896.50 Invoice # 00129 Invoice Date July 15, 2020

Payment Terms

**Due Date** 

## Special Master NRA v. Cuomo et al.

For services rendered between May 01, 2020 and July 15, 2020

#### **Time Entries**

Date	EE	Activity	Description	Rate	Hours	Line Total
05/01/2020	вн	Email	Emails w/ court re status.	\$325.00	0.1	\$32.50
05/01/2020	ВН	Review	Draft and edit report recommendation.	\$325.00	6.0	\$1,950.00
05/02/2020	вн	Edit	Edit report recommendation	\$325.00	1.5	\$487.50
05/03/2020	вн	Edit	Edit report rec	\$325.00	2.0	\$650.00
05/04/2020	вн	Edit	Edit report recommendation	\$325.00	4.5	\$1,462.50
05/04/2020	вн	Review	Edit and review draft report rec.	\$325.00	2.5	\$812.50
05/04/2020	вн	Phone Call	Call w/ Nicole at chambers.	\$325.00	0.2	\$65.00
05/04/2020	вн	Edit	Edit and review report rec and spreadsheets	\$325.00	2.0	\$650.00
05/05/2020	вн	Edit	Review and edit report rec	\$325.00	2.0	\$650.00
05/05/2020	ВН	Edit	Edit and review report rec and spreadsheets, redactions.	\$325.00	5.5	\$1,787.50
05/06/2020	ВН	Review	Edit, revise report recommendation, spreadsheets, docs.	\$325.00	10.5	\$3,412.50
05/08/2020	вн	Phone Call	Emails w/ chambers and letter to judge.	\$325.00	0.2	\$65.00
05/08/2020	вн	Review	Review motion for reconsideration	\$325.00	0.3	\$97.50
05/13/2020	вн	Research and Draft	Research and draft Report Rec 2.	\$325.00	3.5	\$1,137.50
05/15/2020	вн	Research	Research law enforcement privilege; memo re same.	\$325.00	4.0	\$1,300.00
05/15/2020	ВН	Research	Research law enforcement privilege and review submissions.	\$325.00	1.6	\$520.00
05/18/2020	ВН	Phone Call	Phone call w/ Maurice Court I.T. re files.	\$325.00	0.3	\$97.50

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05/18/2020         BH           05/19/2020         BH           05/19/2020         BH           05/26/2020         BH           05/28/2020         BH           05/29/2020         BH           05/30/2020         BH           05/30/2020         BH           06/01/2020         BH           06/01/2020         BH           06/05/2020         BH           06/06/2020         BH           06/06/2020         BH           06/06/2020         BH           06/08/2020         BH           06/08/2020         BH           06/08/2020         BH           06/09/2020         BH           06/09/2020         BH           06/10/2020         BH           06/10/2020         BH           06/10/2020         BH           06/10/2020         BH           06/11/2020         BH           06/11/2020         BH           06/15/2020         BH           06/16/2020         BH           06/16/2020         BH           06/16/2020         BH           06/16/2020         BH           06/16/2020 <th></th> <th></th> <th></th> <th></th> <th></th>					
05/19/2020       BH         05/26/2020       BH         05/28/2020       BH         05/29/2020       BH         05/30/2020       BH         05/30/2020       BH         06/01/2020       BH         06/01/2020       BH         06/02/2020       BH         06/05/2020       BH         06/06/2020       BH         06/06/2020       BH         06/08/2020       BH         06/08/2020       BH         06/08/2020       BH         06/08/2020       BH         06/09/2020       BH         06/09/2020       BH         06/10/2020       BH         06/10/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/15/2020       BH         06/16/2020       BH	BH Research and Draft	Research and draft second report-rec.	\$325.00	2.5	\$812.50
05/20/2020       BH         05/26/2020       BH         05/28/2020       BH         05/29/2020       BH         05/30/2020       BH         06/01/2020       BH         06/01/2020       BH         06/02/2020       BH         06/05/2020       BH         06/06/2020       BH         06/06/2020       BH         06/06/2020       BH         06/08/2020       BH         06/08/2020       BH         06/08/2020       BH         06/09/2020       BH         06/09/2020       BH         06/10/2020       BH         06/10/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/15/2020       BH         06/16/2020       BH	BH Research and Draft	Research and draft second report-rec.	\$325.00	3.0	\$975.00
05/26/2020       BH         05/28/2020       BH         05/29/2020       BH         05/30/2020       BH         06/01/2020       BH         06/01/2020       BH         06/02/2020       BH         06/05/2020       BH         06/06/2020       BH         06/06/2020       BH         06/06/2020       BH         06/08/2020       BH         06/08/2020       BH         06/08/2020       BH         06/09/2020       BH         06/09/2020       BH         06/10/2020       BH         06/10/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/15/2020       BH         06/16/2020       BH	BH Email	Emails w/ chambers re status.	\$325.00	0.1	\$32.50
05/28/2020 BH 05/29/2020 BH 05/30/2020 BH 06/01/2020 BH 06/01/2020 BH 06/05/2020 BH 06/06/2020 BH 06/08/2020 BH 06/08/2020 BH 06/08/2020 BH 06/08/2020 BH 06/08/2020 BH 06/08/2020 BH 06/09/2020 BH 06/09/2020 BH 06/10/2020 BH 06/11/2020 BH 06/11/2020 BH 06/11/2020 BH 06/11/2020 BH 06/11/2020 BH	BH Research and Draft	Research and draft second report-rec.	\$325.00	5.7	\$1,852.50
05/29/2020       BH         05/30/2020       BH         06/01/2020       BH         06/01/2020       BH         06/02/2020       BH         06/05/2020       BH         06/06/2020       BH         06/06/2020       BH         06/06/2020       BH         06/06/2020       BH         06/08/2020       BH         06/08/2020       BH         06/08/2020       BH         06/09/2020       BH         06/10/2020       BH         06/10/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/15/2020       BH         06/16/2020       BH	BH Review/Analysis	Reivew P's opposition to motion for reconsideration.	\$325.00	0.4	\$130.00
05/30/2020 BH 06/01/2020 BH 06/01/2020 BH 06/02/2020 BH 06/05/2020 BH 06/06/2020 BH 06/06/2020 BH 06/06/2020 BH 06/06/2020 BH 06/08/2020 BH 06/08/2020 BH 06/08/2020 BH 06/08/2020 BH 06/08/2020 BH 06/09/2020 BH 06/10/2020 BH 06/11/2020 BH 06/11/2020 BH 06/11/2020 BH 06/11/2020 BH 06/11/2020 BH	BH Research and Draft	Draft report-rec; update spreadsheet; review docs.	\$325.00	4.0	\$1,300.00
06/01/2020       BH         06/01/2020       BH         06/02/2020       BH         06/05/2020       BH         06/06/2020       BH         06/06/2020       BH         06/06/2020       BH         06/06/2020       BH         06/08/2020       BH         06/08/2020       BH         06/08/2020       BH         06/09/2020       BH         06/09/2020       BH         06/10/2020       BH         06/10/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/15/2020       BH         06/15/2020       BH         06/16/2020       BH	BH Draft	Draft second report-rec; update spreadsheet.	\$325.00	3.4	\$1,105.00
06/01/2020       BH         06/02/2020       BH         06/05/2020       BH         06/06/2020       BH         06/06/2020       BH         06/06/2020       BH         06/06/2020       BH         06/08/2020       BH         06/08/2020       BH         06/08/2020       BH         06/09/2020       BH         06/09/2020       BH         06/10/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/15/2020       BH         06/15/2020       BH         06/16/2020       BH	BH Research and Draft	Draft second report-rec; update spreadsheet.	\$325.00	2.2	\$715.00
06/02/2020       BH         06/05/2020       BH         06/06/2020       BH         06/06/2020       BH         06/06/2020       BH         06/06/2020       BH         06/08/2020       BH         06/08/2020       BH         06/08/2020       BH         06/09/2020       BH         06/09/2020       BH         06/10/2020       BH         06/10/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/15/2020       BH         06/15/2020       BH         06/16/2020       BH	BH Review/Analysis	Review and analysis of order on motion to amend.	\$325.00	0.7	\$227.50
06/05/2020       BH         06/06/2020       BH         06/06/2020       BH         06/06/2020       BH         06/06/2020       BH         06/08/2020       BH         06/08/2020       BH         06/09/2020       BH         06/09/2020       BH         06/10/2020       BH         06/10/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/15/2020       BH         06/16/2020       BH         06/16/2020       BH	BH Review/Analysis	Review spreadsheet and docs	\$325.00	0.5	\$162.50
06/06/2020       BH         06/06/2020       BH         06/06/2020       BH         06/06/2020       BH         06/08/2020       BH         06/08/2020       BH         06/08/2020       BH         06/09/2020       BH         06/09/2020       BH         06/10/2020       BH         06/10/2020       BH         06/11/2020       BH         06/11/2020       BH         06/11/2020       BH         06/15/2020       BH         06/16/2020       BH         06/16/2020       BH	BH Research and Draft	Research and draft second report recommendation	\$325.00	1.5	\$487.50
06/06/2020 BH  06/06/2020 BH  06/06/2020 BH  06/08/2020 BH  06/08/2020 BH  06/08/2020 BH  06/09/2020 BH  06/10/2020 BH  06/11/2020 BH  06/11/2020 BH  06/11/2020 BH  06/11/2020 BH  06/11/2020 BH	BH Research and Draft	Research and draft second report rec; update spreadsheet.	\$325.00	2.0	\$650.00
06/06/2020 BH  06/08/2020 BH  06/08/2020 BH  06/08/2020 BH  06/08/2020 BH  06/09/2020 BH  06/10/2020 BH  06/10/2020 BH  06/11/2020 BH  06/11/2020 BH  06/11/2020 BH  06/11/2020 BH  06/11/2020 BH  06/11/2020 BH	BH Review/Analysis	Review DFS docs; update spreadsheet and draft second report-recommendation.	\$325.00	3.6	\$1,170.00
06/06/2020 BH  06/08/2020 BH  06/08/2020 BH  06/08/2020 BH  06/09/2020 BH  06/10/2020 BH  06/10/2020 BH  06/11/2020 BH  06/11/2020 BH  06/11/2020 BH  06/11/2020 BH  06/11/2020 BH	BH Review/Analysis	Review SAC.	\$325.00	0.4	\$130.00
06/08/2020 BH 06/08/2020 BH 06/08/2020 BH 06/09/2020 BH 06/09/2020 BH 06/10/2020 BH 06/10/2020 BH 06/11/2020 BH 06/11/2020 BH 06/11/2020 BH 06/11/2020 BH	BH Review	Review letter motion from Brewer re letters rogatory.	\$325.00	0.1	\$32.50
06/08/2020 BH  06/08/2020 BH  06/09/2020 BH  06/10/2020 BH  06/10/2020 BH  06/11/2020 BH  06/11/2020 BH  06/11/2020 BH  06/11/2020 BH  06/15/2020 BH	BH Review/Analysis	Review DFS docs and spreadsheet; draft second reportrec.	\$325.00	1.5	\$487.50
06/08/2020 BH  06/09/2020 BH  06/09/2020 BH  06/10/2020 BH  06/10/2020 BH  06/11/2020 BH  06/11/2020 BH  06/11/2020 BH  06/15/2020 BH  06/16/2020 BH	BH Email	Emails w/ chambers re call.	\$325.00	0.2	\$65.00
06/09/2020 BH 06/09/2020 BH 06/10/2020 BH 06/10/2020 BH 06/10/2020 BH 06/11/2020 BH 06/11/2020 BH 06/11/2020 BH 06/15/2020 BH 06/16/2020 BH	BH Review/Analysis	Review DFS docs; spreadsheet update. Draft second report rec	\$325.00	3.0	\$975.00
06/09/2020 BH  06/10/2020 BH  06/10/2020 BH  06/10/2020 BH  06/11/2020 BH  06/11/2020 BH  06/15/2020 BH  06/16/2020 BH	BH Research	Research re law enforcement privilege/settlement negotiations.	\$325.00	1.0	\$325.00
06/10/2020 BH 06/10/2020 BH 06/10/2020 BH 06/11/2020 BH 06/11/2020 BH 06/15/2020 BH 06/16/2020 BH	BH Review/Analysis	Review DFS docs; update and edit spreadsheet.	\$325.00	2.3	\$747.50
06/10/2020 BH 06/10/2020 BH 06/11/2020 BH 06/11/2020 BH 06/15/2020 BH 06/16/2020 BH	BH Email	Review and respond to emails w/ chambers re RR.	\$325.00	0.2	\$65.00
06/10/2020 BH 06/11/2020 BH 06/11/2020 BH 06/15/2020 BH 06/16/2020 BH	BH Review/Analysis	Review emails from Nicole at Chambers; review draft order	\$325.00	0.4	\$130.00
06/11/2020 BH 06/11/2020 BH 06/15/2020 BH 06/16/2020 BH	BH Edit	Edit and review first RR	\$325.00	1.0	\$325.00
06/11/2020 BH 06/15/2020 BH 06/16/2020 BH 06/16/2020 BH	BH Email	Emails w/ chambers re call.	\$325.00	0.1	\$32.50
06/15/2020 BH 06/16/2020 BH 06/16/2020 BH	BH Conference Call	Prep for and call w/ chambers.	\$325.00	1.0	\$325.00
06/16/2020 BH 06/16/2020 BH	BH Phone Call	Phone calls w/ IT at Court, review final docs; emails w/ Nicole and IT.	\$325.00	1.0	\$325.00
06/16/2020 BH	BH Email	Emails w/ nicole and Maurice Court I.T.	\$325.00	0.1	\$32.50
	BH Email	Emails w/ Nicole; phone calls w/ I.T.	\$325.00	0.3	\$97.50
06/17/2020 BH	BH Review/Analysis	Review docs; update spreadsheet.	\$325.00	2.0	\$650.00
	BH Research and Draft	Draft second report rec; update spreadsheet.	\$325.00	1.7	\$552.50
06/17/2020 BH	BH Review	Review and prepare USBs, emails w/ chambers, conf w/ Court.	\$325.00	1.5	\$487.50
06/17/2020 BH	BH Review	Review and draft second rr.	\$325.00	1.5	\$487.50

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06/22/2020	ВН	Research and Draft	Draft and edit second report-recommendation.	\$325.00	5.5	\$1,787.50
06/22/2020	ВН	Edit	Edit second report rec	\$325.00	1.0	\$325.00
06/23/2020	вн	Edit	Edit and draft second report rec.	\$325.00	4.0	\$1,300.00
06/24/2020	ВН	Draft	Second report rec; edit and review spreadsheet.	\$325.00	6.0	\$1,950.00
06/25/2020	ВН	Phone Call	phone call w/ tara at Chambers.	\$325.00	0.2	\$65.00
06/25/2020	ВН	Email	Emails w/ chambers	\$325.00	0.2	\$65.00
06/25/2020	вн	Email	Emails w/ Tara at Chambers.	\$325.00	0.1	\$32.50
06/25/2020	вн	Research and Draft	Research and draft second report rec.	\$325.00	7.0	\$2,275.00
06/26/2020	ВН	Edit	Review and edit spreadsheet	\$325.00	1.0	\$325.00
06/26/2020	вн	Email	Emails w/ tara.	\$325.00	0.1	\$32.50
06/26/2020	вн	Edit	Review and edit DFS spreadsheet	\$325.00	3.0	\$975.00
06/26/2020	вн	Review/Analysis	Review and analysis of sealed SAC and exhibits; review notes.	\$325.00	1.0	\$325.00
06/29/2020	вн	Research and Draft	Research and draft second report-rec.	\$325.00	3.2	\$1,040.00
06/30/2020	вн	Research and Draft	Research and draft second report-recommendation	\$325.00	5.0	\$1,625.00
06/30/2020	ВН	Review/Analysis	Review and analysis of MTDs the SAC.	\$325.00	1.5	\$487.50
07/07/2020	вн	Review/Analysis	Review and edit spreadsheet.	\$325.00	3.0	\$975.00
07/07/2020	вн	Research	Memo re attorney notes.	\$325.00	0.5	\$162.50
07/07/2020	вн	Review/Analysis	Review docket.	\$325.00	0.1	\$32.50
07/08/2020	вн	Edit	Edit and review second report rec.	\$325.00	6.5	\$2,112.50
07/10/2020	вн	Edit	Edit and review second report recommendation.	\$325.00	5.7	\$1,852.50
07/10/2020	вн	Edit	Edit second report-recommendation.	\$325.00	0.2	\$65.00
07/13/2020	вн	Edit	Review and edit RR, spreadsheet, redacted docs; email w/ chambers.	\$325.00	5.0	\$1,625.00
07/13/2020	ВН	Review/Analysis	Review McAvoy order on Preliminary Injunction	\$325.00	0.7	\$227.50

Totals: **156.1 \$50,732.50** 

# **Expenses**

Date	EE	Activity	Description	Cost	Quantity	Line Total
05/06/2020	ВН	Copies	Copies of draft rep rec and spreadsheets	\$0.25	268.0	\$67.00
06/25/2020	вн	Copies	Spreadsheet for review	\$0.25	388.0	\$97.00

Expense Total: \$164.00

Balance Due:	\$50,896.50
Amount Paid:	\$0.00
Total:	\$50,896.50
Sub-Total:	\$50,896.50
Expense Sub-Total:	\$164.00
Time Entry Sub-Total:	\$50,732.50